AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

SOUTHERN DISTRICT OF MISSISSIPPI
FILED
APR 25 2016
ARTHUR JOHNSTON
BY ______ DEPUTY

United States of America
v.

Naomi Ziccardi and
Marlda Leticia Arellano

Defendant(s)

Case No. 2:16mj 5 -MTP

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 23, 2016 in the county of Jones in the Southern District of MS, Eastern Division, the defendant(s) violated:

Code Section	*Offense Description*
21 U.S.C. 841(a)(1)	Possession with Intent to Distribute a Controlled Substance, to wit, 500 grams or more of a mixture or substance containing a detecable amount of methamphetamine, a schedule II narcotic drug controlled substance.

This criminal complaint is based on these facts:

See affidavit attched hereto and incorporated herein

☑ Continued on the attached sheet.

Complainant's signature

David Ward, Task Force Agent DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/25/2016

Judge's signature

City and state: Hattiesburg, MS

Michael T. Parker, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, David Ward, being first duly sworn, state as follows:

Introduction

I am a Task Force Officer (TFO) with the United States Department of Justice, Drug Enforcement Administration (DEA). I have been a Task Force Officer with the DEA since January 2016. I have been employed by the Jones County Sheriff's Office since 2010. I am currently assigned to the Forrest County M.I.T. located in Hattiesburg, MS. During the course of my employment, I have participated in numerous investigations of illegal narcotics trafficking and violations of Title 21 United States Code.

Probable Cause Factual Basis

Your affiant states that on April 23, 2016 at approximately 12:56 am, Jones County Sheriff's Deputy LT. George Dominguez was on duty, conducting traffic enforcement on Interstate I-59. Lt. Dominguez was traveling south bound behind a white Dodge Journey displaying Texas Tag GSK 7065. Lt. Dominguez observed the vehicle traveling 70 mph in a 60mph zone inside the city limits of Laurel, MS.

Lt. Dominguez conducted a traffic stop on the vehicle near 96 mile marker. Lt. Dominguez identified the driver as Naomi ZICCARDI. Lt. Dominguez asked ZICCARDI to exit the vehicle so he could issue a written warning for the offense. Lt. Dominguez then noticed discrepancies in ZICCARDI'S account of her travel. Lt. Dominguez then questioned the passenger of the vehicle Marlda Leticia ARELLANO. ARELLANO is also the registered owner of the vehicle.

Lt. Dominguez asked for and received verbal consent to search the vehicle from ZICCARDI, the driver of the vehicle. Lt. Dominguez also got a signed consent to search form from ARELLANO, the registered owner of the vehicle. While conducting the search Lt. Dominguez noticed that the spare tire had recently been tampered with. Upon further inspection of the spare tire, it appeared to have no schrader valve in the valve stem. Lt. Dominguez then scanned the tire with his hand held backscatter machine and saw that there was something in the tire. Lt. Dominguez pried the tire open and noticed seven bags containing a crystal like substance that appeared to be methamphetamine weighing approximately 4 pounds.

The substance was field tested and yielded a positive result for the presence of Methamphetamine. ZICCARDI and ARELLANO were placed under arrest for possession of a controlled substance and transported to the Jones County Sheriff's Office where they both were processed pending an Initial Appearance in Federal Court.

CONCLUSION

Based upon my experience as a DEA Task Force Officer and the facts listed above involving Naomi ZICCARDI and Marlda Leticia ARELLANO, it is my opinion that there is probable cause to believe that Naomi ZICCARDI and Marlda ARELLANO committed violations of Title 21 U.S.C. 841 (a) (1) in the Southern District of Mississippi.

____
David Ward
Task Force Officer
Drug Enforcement Administration

Sworn and subscribed to me this 25 day of April, 2016.

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UNITED STATES MAGISTRATE JUDGE